

1 Cam Ferenbach  
2 Nevada Bar No. 96  
Jennifer L. Braster  
3 Nevada Bar No. 9982  
LIONEL SAWYER & COLLINS  
4 1700 Bank of America Plaza  
300 South Fourth Street  
Las Vegas, Nevada 89101  
(702) 383-8888 (Telephone)  
(702) 383-8845 (Fax)

5  
6 Michael J. Lennon  
7 Mark A. Hannemann  
Jeffrey S. Ginsberg  
8 KENYON & KENYON LLP  
One Broadway  
9 New York, NY 10004  
(212) 425-7200 (Telephone)

10 *Attorneys for Robert Bosch LLC*

11  
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 ROBERT BOSCH LLC,

Case No. 2:10-cv-1932

15 Plaintiff,

**COMPLAINT**

16 v.

[JURY TRIAL DEMANDED]

17 UNIPOINT ELECTRIC MFG. CO., LTD., and  
UNIPOINT NORTH AMERICA,

18 Defendants.

19  
20 Plaintiff Robert Bosch LLC (“Bosch”), through its attorneys, for its complaint against  
21 Defendant Unipoint Electric Mfg. Co., Ltd. and Defendant Unipoint North America  
22 (collectively, “Defendants”), avers as follows:

23 1. This action arises under the patent laws of the United States, Title 35 of the  
24 United States Code (for example, 35 U.S.C. §§ 271, 281, 283, 284, and 285) as hereinafter more  
25 fully appears. This Court has jurisdiction over the subject matter of the action pursuant to 28  
26 U.S.C. §§ 1331 and 1338.  
27

28

1           2. On April 29, 2003, United States Letters Patent No. 6,553,607 (attached as  
2 Exhibit A) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner  
3 of those Letters Patent.

4           3. Defendants have infringed and still are infringing those Letters Patent directly and  
5 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the  
6 patented invention, such as the 71 Series wiper blade products, and will continue to do so unless  
7 enjoined by this Court.

8           4. On September 2, 2003, United States Letters Patent No. 6,611,988 (attached as  
9 Exhibit B) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner  
10 of those Letters Patent.

11           5. Defendants have infringed and still are infringing those Letters Patent directly and  
12 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the  
13 patented invention, such as the 71 Series wiper blade products, and will continue to do so unless  
14 enjoined by this Court.

15           6. On September 20, 2005, United States Letters Patent No. 6,944,905 (attached as  
16 Exhibit C) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner  
17 of those Letters Patent.

18           7. Defendants have infringed and still are infringing those Letters Patent directly and  
19 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the  
20 patented invention, such as the 71 Series and 6C Series wiper blade products, and will continue  
21 to do so unless enjoined by this Court.

22           8. On November 13, 2007, United States Letters Patent No. 7,293,321 (attached as  
23 Exhibit D) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner  
24 of those Letters Patent.

1           9. Defendants have infringed and still are infringing those Letters Patent directly and  
2 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the  
3 patented invention, such as the 6C Series wiper blade products, and will continue to do so unless  
4 enjoined by this Court.

5           10. On April 28, 2009, United States Letters Patent No. 7,523,520 (attached as  
6 Exhibit E) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner  
7 of those Letters Patent.

8           11. Defendants have infringed and still are infringing those Letters Patent directly and  
9 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the  
10 patented invention, such as the 6C Series wiper blade products, and will continue to do so unless  
11 enjoined by this Court.

12           12. Defendants' infringement has caused and will continue to cause damage and  
13 irreparable harm to Bosch until enjoined by this Court.

14           WHEREFORE, Plaintiff demands an injunction against continued infringement, an  
15 award of damages, an assessment of interest and costs against Defendants, and such other relief  
16 as the Court may find just and proper.

17           ...

18           ...

19           ...

20           ...

21           ...

22           ...

23           ...

24           ...

25           ...

26           ...

27           ...

28

**JURY DEMAND**

Plaintiff demands a trial by jury.

## LIONEL SAWYER & COLLINS

By: /s/ Cam Ferenbach  
Cam Ferenbach  
Nevada Bar No. 96  
Jennifer L. Braster  
Nevada Bar No. 9982  
1700 Bank of America Plaza  
300 South Fourth Street  
Las Vegas, Nevada 89101

Michael J. Lennon  
Mark A. Hannemann  
Jeffrey S. Ginsberg  
KENYON & KENYON LLP  
One Broadway  
New York, NY 10004  
(212) 425-7200 (Telephone)

Attorneys for Robert Bosch, LLC

LIONEL SAWYER  
& COLLINS  
ATTORNEYS AT LAW  
BANK OF AMERICA PLAZA  
100 SOUTH FOURTH ST.  
LAS VEGAS,  
NEVADA 89101  
(702) 383-8888